

APR 20 1993

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Amendment of the Commission's )  
Rules to Establish a Single AM )  
Radio Stereophonic Transmitting )  
Equipment Standard )

ET Docket No. 92-298

**REPLY COMMENTS OF THE CONSUMER ELECTRONICS GROUP  
OF THE ELECTRONIC INDUSTRIES ASSOCIATION**

The Consumer Electronics Group of the Electronic Industries Association ("EIA/CEG") hereby replies to comments submitted in response to the above-captioned Notice of Proposed Rulemaking. EIA/CEG replies solely to address comments pertaining to the performance of AM radio receivers.

In particular, we wish to address comments filed by James Dorrence, Communications Technologies, National Association of Broadcasters ("NAB"), and Capital Cities/ABC ("ABC"). All of these parties have found it necessary to use this proceeding as a vehicle to convey to the Commission their displeasure with the quality of AM radios. Though completely irrelevant to the

~~proposal set forth in the Notice, these comments cannot be~~

proceeding." ABC faulted manufacturers for not making receivers which meet the NRSC-3 standard and the Commission for not publishing a list of high-quality AM receivers. ABC further suggested that legislative or regulatory prescription of mandatory AM receiver performance standards may be necessary.<sup>1</sup> For its part, NAB complained about the "sluggish pace at which the receiver industry has been designing and marketing radios meeting the AMax criteria" and urged the Commission to monitor the production of AM radios with a view to the inclusion not only of AM stereo but also of "full AMax technology."

These comments are beyond the scope of the present proceeding. What is worse, they are misinformed and misdirected. In this regard, it is noteworthy that the Commission has previously been presented with proposals to regulate receiver design, but it has wisely decided not to do so.<sup>2</sup> Similarly, although earlier legislative proposals relating to AM stereo also included provisions authorizing or requiring regulation of AM receivers, none has ever been enacted; indeed, no such bills have ever been approved even by a single congressional subcommittee. The bill Congress passed, and the one which required the present proceeding, directs the Commission to establish an AM stereophonic broadcast standard. Comments directed to issues

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<sup>1</sup>/ The engineering statement appended to ABC's comments elaborated on these points and also proposed requirements for publication of AM radio receiver quality specifications.

<sup>2</sup>/ Review of the Technical Assignment Criteria for the AM Broadcast Service, 6 FCC Rcd. 6273, 6338-39 (¶¶ 205-209 (1991), reconsideration pending.

other than the broadcast standard distract the Commission from the serious matters that must be addressed under the law.

Further, as a factual matter, complaints about the narrow bandwidth of AM receivers overlook the technical considerations which caused receiver manufacturers to design their receivers in the manner they did. Congestion in the AM band increased substantially in the 1980's, and until industry agreement on NRSC-3 there was no standardization of the signal processing techniques of individual AM broadcasters. As a result, narrower receiver bandwidths were needed to reject undesired processed signals from adjacent and even second adjacent channels. Now that NRSC specifies preemphasis standards, receiver bandwidths can be (and are being) broadened.

consumers want. Conversely, we will not build what consumers do not want. And, to be quite frank about it, consumers have not expressed much enthusiasm for better AM radios. Demand for AMax products has never really developed.

We do not think this situation warrants a proposal that the government force manufacturers to build, or consumers to pay for, different kinds of radios. Such proposals seem particularly inappropriate in light of other obvious explanations for the current plight of AM radio broadcasting. For example, one veteran radio programmer and new AM station owner recently said, "Broadcasters made the problem, and they can fix it. The only real problem with AM is putting on programming people want to hear."<sup>3</sup> This kind of statement is difficult to reconcile with the efforts of some parties to blame receiver manufacturers for the current circumstances of AM radio.

In any event, the focus of this proceeding is on AM stereo. We believe adoption of an AM stereo broadcasting standard creates a significant opportunity -- perhaps the last

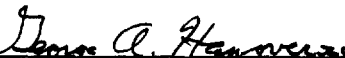
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3/ "A WINX and a Nod," Washington City Paper, at 12 (Dec. 18, 1992). The following quotation is in a similar vein: "AM is succumbing because it has displaced its inventiveness, and creativity and daring are the only things that can revive it. Its technical defects are blamed for its dismal state, but there is a more valid reason why AM is in decline. For too long, AM has relied on a menu consisting of stale formula to attract and hold listeners." Michael C. Kieth, "Monday Memo: AM Is Not Dying Because It Has Static; It Is Dying Because It Is Static," Broadcasting, at 20 (Oct. 12, 1992).

such opportunity that will arise -- to regenerate listener interest in AM radio broadcasting. The Commission will surely do its part by selecting a system within the statutory deadline. Manufacturers will do theirs by building a variety of radios, at a wide range of price points, that offer consumers the quality and features they want at a price they can afford. Broadcasters would be well advised to focus their energies on making the most of the present opportunity, not wasting their time pursuing counterproductive goals of regulations for manufacturers of radio receivers.

Respectfully submitted,

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April 20, 1993

CERTIFICATE OF SERVICE

I hereby certify that the foregoing "Reply Comments of the Consumer Electronics Group of the Electronic Industries Association" was served this 20th day of April, 1993, by first class, postage prepaid mail, to:

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